

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION II

DATE: SEP 26 1988

TANET
Chapter

SUBJECT: Requests for Rapid Authorization of Trust Monies for CERCLA Removal Action at the SCP/Carlstadt Site, Carlstadt, New Jersey.

FROM: *R. Salkie*
Robert L. Harris, On-Scene Coordinator,
Response and Prevention Branch



TO: Stephen D. Luftig, Director
Emergency and Remedial Response Division

THRU: *R. Salkie*
Richard Salkie, Associate Director
Removal Program Office

SUMMARY

On September 7, 1988 representatives of the Response and Prevention Branch visited the SCP/Carlstadt site to investigate a report that heavy leakage from tank T-5 was occurring and the tank was in critical condition. The tank contains sludge with PCBs and heavy metals. During the removal of tanks from the site by a responsible party during 1986, T-5 was left stored on the site because no facility capable of incinerating the contents in an acceptable manner was found. It is intended that the sludge be treated in concert with the contaminated soil and/or excavated wastes associated with forthcoming remedial operations.

The investigation of September 7, 1988, led to the conclusion that there was no heavy leakage from T-5 and that the tank was not in critical condition with respect to losing the contents. The tank is contained within a roll-off, however the roll-off container is not sealed or presently covered from effects of precipitation. The roll-off and tank were covered in 1986 with a tarpaulin, but that cover has since blown off. There is a small amount of tarry, very immobile material in the roll-off that has accumulated in the 20 months since T-5 was secured there in December 1986.

As a result of the investigation it is concluded that the tank and the roll-off in which it rests should be covered with a tarpaulin to prevent rain water from contacting any traces of seepage from the tank to remove the threat to the environment.

On September 19, 1988, verbal approval was received from you for this removal action.

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THREAT

The principal potential threat from the storage of tank T-5 at the SCP/Carlstadt site is to add further contamination to the soil of the site. Rainwater could wash seepage on the surface of the tank and interior of the roll-off onto the concrete pad on which the assembly rests. The concrete pad does not have a curb. Vandalism and human contact are not a threat providing the current responsible party corrects and maintains the integrity of the perimeter fence/gates.

PROPOSED ACTION

The proposed immediate action is to contract through ERCS to measure, fit and secure a durable coated fabric tarpaulin to cover the tank and the roll-off as the assembly rests on its concrete pad.

The cost of mitigation contracting for the tarping installation; adding an absorptive agent below the tank, inside the roll-off; and repairing the openings in the perimeter fence/gate is \$8,000. Intramural and TAT costs are estimated to be \$3,000 and \$4,000, respectively. The total project ceiling is \$15,000.

ENFORCEMENT

Site Compliance will be issuing a Notice Letter to a potential responsible party asking that it undertake this removal action. The proposed action will not be performed by EPA until an answer to the letter has been received.

RECOMMENDATIONS

The present storage of tank T-5 at the SCP/Carlstadt site, pending its on-site treatment or the discovery of an off-site facility with a new process for properly treating its contents, represents conditions under which 40 CFR300.65(b)(2) the National Contingency Plan (NCP) would support a removal action in that there exists:

a) "Hazardous substances, pollutants or contaminants in drums, barrels, tanks or other bulk storage containers that may pose a threat of release [Section 300.65 (b)(2) (iii)]".

As required by Section 104(2) of CERCLA, the proposed removal action will contribute to the efficient performance of any long term remedial action at this site.

This is to confirm in writing your verbal approval of September 19, 1988. Please indicate your approval and funding authorization per current delegations of authority, by signing below.

APPROVED: _____

Steph D. Luft

DATE: _____

9/29/88

DISAPPROVED: _____

DATE: _____

CC: (after approval is obtained)

W. Muszynski, 2RA
K. Callahan, 2ERR-DD
R. Salkie, 2ERR-RPO
G. Zachos, 2ERR-RP
B. Sprague, 2ERR-RP
J. Czapor, 2ERR-SC
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